



EPA Region 5 Records Ctr.



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September 28, 2007

Mr. Sam Chummar, Remedial Project Manager
U.S. Environmental Protection Agency - Region 5
Superfund Division - Remedial Response Branch #1
77 W. Jackson Blvd. (SR-6J)
Chicago, IL 60604

Subject: Response to Comments – Letters Dated September 11 and September 24, 2007
Plainwell Mill, Operable Unit No. 7, Allied Paper, Inc./Portage Creek/Kalamazoo River Site
Plainwell Mill Banks Emergency Action Conceptual Design Approach and
Plainwell Mill Banks Emergency Action Design Report

Dear Sam:

Attached for your use is a summary of responses to your comment letters dated September, 11, 2007 and September 27, 2007. Applicable comments will also be integrated into a Final Plainwell Mill Banks Emergency Action Design Report that will be prepared after your approval of the design activities and concurrently with field work.

As with the Emergency Action work in the 12th Street Landfill Powerhouse Channel, please recall that Weyerhaeuser is obligated under Paragraph 67 (Emergency Response) of our 2005 Consent Decree to “immediately take all appropriate action to prevent, abate or minimize a release or threat of a release”. This requirement along with the current schedule of the Former Plainwell Impoundment Time Critical Removal Action (TCRA) requires expedited action with limited time for multiple reviews and re-submittals. Providing actions consistent with the TCRA schedule requires cooperation between the regulatory agencies and Weyerhaeuser. Which have been very successful on the Channel work. We look forward to the same successes on the Mill Bank Emergency Action.

When applicable, the comment responses reflect changes that will be included in the Final Plainwell Mill Banks Emergency Action Design Report. The *Plainwell Mill Banks Emergency Action Conceptual Design Approach* will not be revised separately. Further discussions and resolution of your comments addressing the construction of the top of bank work platform and the Residuals containment pad are critical to the timely completion of this Emergency Action in 2007. Some additional details can be provided, but any plan will be modified based upon conditions encountered in the field. In the interest of limiting both preparation and review time, the level of detail was developed to be similar to that reflected in the approved TCRA Design Report. Furthermore, since the planned Emergency Actions precede the Remedial Investigation and are well in advance of the final remedy, there will be additional opportunities to consider the applicable amount of investigation necessary for this site. Thus we look forward to discussing your comments on the site preparation activities and all aspects of the Plainwell Banks Emergency Action Design Report on Tuesday, October 3.

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Plainwell Mill Banks Emergency Action Conceptual Design Approach (Comments dated September 11, 2007)

General Comments

- A. When referring to a document by its whole title, please italicize the title.

Comment Noted

- B. The terms "bank" and "shoreline" are being used interchangeably within the document. Region 5 suggests that a single term, "bank," be used.

Comment Noted

Specific Comments

1. Page 1, Paragraph 2: RMT states that, "In a letter dated June 29, 2007, the United States Environmental Protection Agency (USEPA) has acknowledged that the actions being taken for the Plainwell TCRA could cause a release of hazardous substances from the Plainwell Mill Property." This sentence mischaracterizes U.S. EPA's letter of June 29, 2007. In that letter, U.S. EPA stated its understanding that Weyerhaeuser had determined that certain work to be performed in connection with the time-critical removal action at the Plainwell Impoundment threatened the release of waste material from the banks of the Plainwell Mill. U.S. EPA authorized Weyerhaeuser to take response actions consistent with the company's determination. Please either rephrase your statement to accurately characterize the 6/29/07 letter, or delete this sentence from the paragraph.

This language has been modified in the Plainwell Mill Banks Emergency Action Design Report (Design Report).

2. Page 1, Paragraph 2: It is unclear what is meant by "containing paper residuals." Please provide additional details. Please remove the word "generally" from the last sentence of this paragraph.

Paper residuals are materials generated from wastewater discharges from paper making facilities. In the context of the sentence, the phrase "excavating or containing paper residuals" refers to the available control options to either remove or contain paper residuals and thus limit or eliminate the threat of a release of waste material. The phrase "generally" so that our bank design does not need to follow the slope prescriptions of the TCRA, since conditions at the Plainwell Mill banks are somewhat different from those present in other areas of the Plainwell Impoundment.

3. Page 1, Paragraph 3: Please specify the number of hand augers placed during the July 2007 investigation.

A total of 39 hand augers were advanced in July of 2007 and this number is included on Page 1 of the Design Report. In addition, Appendix B in the Design Report describes the work completed and provides an estimate of the extent of residuals along the Plainwell Mill Banks.

4. Page 2, Bullet 3 (top of the page): "Multiple" and "flexible" are redundant in this sentence. Please remove "multiple."

Comment Noted

5. Page 2, Bullet 1 (middle of the page): Emergency actions taken should also be addressing known PCB hits above 50 PPM. Please rephrase the sentence to reflect this requirement.

This change will be incorporated into the Final Design Report:

- *To remove areas with documented polychlorinated biphenyls (PCBs) concentrations greater than 50 ppm and visible paper residuals to a target concentration of 4 ppm PCBs.*

6. Page 2, Bullet 2 (middle of the page): This bullet is poorly phrased; this bullet implies there will be a continued release of PCBs from the site, even after the emergency action.

The modifications to this language will be incorporated into the Final Design Report as follows:

- *To reconstruct bank, as needed, to prevent, abate or minimize the release or threat of release of PCBs*

7. Page 2, Bullet 3 (middle of the page): Reconstruction and reconfiguration of the banks should be as consistent with City of Plainwell re-development plans to the extent practicable. Please consult with the City of Plainwell.

Weyerhaeuser is working closely with the City on the bank reconfiguration issues.

8. Page 3, Step 5: It is unclear if the “post-excavation survey” will be taken prior to any reconstruction of the banks or after. This should be clarified.

The post excavation survey has been eliminated in the final design.

9. Page 4, Table: The label for column “Approximate Volume to be Removed (Cubic Yards)” is ambiguous. Do the numbers represent cubic yards to be removed from the banks (shoreline), floodplain, sediments, or cumulatively? This should be revised.

The quantity presented is collective of bank, floodplain, and sediments for each zone. Clarification will be added in the Final Design Report.

10. Page 7, Section 2.2, Paragraph 1: The method employed for handling of and disposal of root wads should take into consideration the potential for PCB residuals to be adhered to the root wads.

The Final Design Report will include similar language to the following: Most root wads will be left in place to help maintain stable banks. If root wads are removed from the bank area or in zones with previously identified residuals, these removed root wads will be disposed off site with the residual material.

11. Page 8, Section 2.5, Paragraph 2: In which part of the river (near banks, middle, opposite bank) will turbidity monitoring take place? In addition, if safety permits, downstream measurements should be taken closer to the active excavation area. It should also be noted that additional anchoring will be needed for the silt curtain, based on the effort currently required to maintain the silt curtains at the Plainwell Impoundment Time Critical Removal.

Page 15 of the Design Report includes a more description of the placement of monitoring equipment and silt curtains.

12. Page 9, Section 2.8, Paragraph 1: Please define “moderate stresses” and the expected slope of the reconfigured/reconstructed banks.

The term moderate stresses will be eliminated from the final design report. Instead the sentence will be revised as follows: In the interim, the banks will be stabilized to limit erosion by re-vegetation and/or placement of well-graded 6-inch D50 river-run stone or similar material as approved by the engineer.

13. Attachment 1: Region 5 does not believe the inclusion of this attachment supports the CDA in any substantial manner. Please remove the attachment.

Comment Noted

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U.S. Environmental Protection Agency
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Plainwell Mill Banks Emergency Action Design Report (Comments dated September 24, 2007)

Comments

1. Section 2.2.2 - Top of Bank Work Platform: During the construction/grading of the work platform, the movement of soil present on site may also spread contamination existing on site. Region 5 recommends either testing the soil prior to movement or using clean imported material to construct the work platform.

To be discussed further with USEPA on October 3.

2. Section 2.2.3, Page 8 Paragraph 3: It is likely the outfalls will be incorporated into the *Remedial Investigation* (RI). Please take this into consideration during your design.

Comment Noted

3. Section 2.2.4, Page 8, Paragraph 5: Please provide the reference "Consumers Energy, 2007."

A copy of this reference is included with this letter.

4. Section 2.2.5 - Residuals Containment Area:

- 4a. The proposed location of the Residuals Containment Area (RCA) is the former aeration basin. The design for the RCA calls for use of topsoil from this area to be used as containment berms. This movement of this soil may also spread contamination existing on site. Region 5 recommends either testing the soil prior to movement, or using clean imported material to construct the berms.

To be discussed further with USEPA.

- 4b. No detailed design has been offered for the RCA. A detailed design must be provided.

To be discussed further with USEPA..

5. Section 2.2.7: A maintenance schedule should be provided for the wastewater treatment system. Additionally, Region 5 has concern over the limited capacity of the wastewater treatment system.

The system treatment capacity has been increased from 25 gpm to 200 gpm and text will be revised to reflect this change in the final Design Report.

Region 5 also requests, if not already completed, Weyerhaeuser submit the necessary substantive requirement documents and work with the Michigan Department of Environmental Quality (MDEQ) to identify any procedures the Emergency Action must comply with.

Weyerhaeuser is working closely with MDEQ staff to ensure that appropriate submittals are made.

The team and I look forward to additional discussion of these and other issues during out meetings on October 3, 2007. Please contact me at 253-924-3746 if you have any questions.

Mr. Sam Chummar
U.S. Environmental Protection Agency
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Sincerely,

Weyerhaeuser Company

A handwritten signature in black ink, appearing to read "Jennifer Hale". The signature is fluid and cursive, with the first name "Jennifer" written in a larger, more prominent script than the last name "Hale".

Jennifer Hale
Environmental Manager

cc: Paul Bucholtz, MDEQ
Eileen Furey, C-14J
Michael Berkoff, SR-6J
Jim Saric, SR-6J
Mark Schneider, Perkins Coie
Joe Jackowski, Weyerhaeuser
John Gross, Weyerhaeuser
James Hutchens, RMT, Inc.
Kathy Huibregtse, RMT, Inc.